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7 Attorney for Solomon Nathaniel Newell

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SOLOMON NATHANIEL NEWELL,

15 Defendant.
16

Case No. 2:19-cr-00137-RFB-NJK

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between
18 Nicholas A. Trutanich, United States Attorney, and Linda Mott, Assistant United
19 States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal
20 Public Defender, and Brandon C. Jarock, Assistant Federal Public Defender, counsel for
21 Solomon Nathaniel Newell, that the previously ordered deadline for filing of pretrial motions
22 be vacated and that the parties herein shall have to and including October 18, 2019, within
23 which to file the Defendant's pretrial motions currently due October 11, 2019.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including November 1, 2019, to file any and all responsive pleadings, currently
26 due October 18, 2019.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including November 8, 2019, to file any and all replies to dispositive motions,
3 currently due October 25, 2019.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to meet and discuss the
6 government's proposed resolution with his client; and to determine whether to file a pretrial
7 motion should his client reject the government's proposed resolution.

8 2. The defendant is not incarcerated and does not object to the continuance.

9 3. The parties agree to the continuance.

10 4. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed
12 resolution with his client.

13 5. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 This is the first stipulation to continue filed herein.

16 DATED this 9th day of October, 2019.

17 RENE L. VALLADARES
18 Federal Public Defender

NICHOLAS A. TRUTANICH
Acting United States Attorney

19 */s/ Brandon C. Jaroch*
20 By _____
21 BRANDON C. JAROCH
Assistant Federal Public Defender

/s/ Linda Mott
By _____
LINDA MOTT
Assistant United States Attorney

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including October 18, 2019, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 1, 2019, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 8, 2019, to file any and all replies to dispositive motions.

DATED this 10th day of October, 2019.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE